

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

EDWARD BUTOWSKY, §
§
Plaintiff, §
§
v. §
§
MICHAEL GOTTLIEB, et al., §
§
Defendants. §

CIVIL ACTION NO. 4:19-cv-0180-ALM-KPJ

**TURNER DEFENDANTS' UNOPPOSED MOTION TO
EXTEND DEADLINE TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Defendants Turner Broadcasting System, Inc., Anderson Cooper, Gary Tuchman, Oliver Darcy, and Tom Kludt (collectively, the “Turner Defendants”) file this Unopposed Motion seeking an extension of time to answer or otherwise respond to Plaintiff’s Original Complaint (Doc. 1), and in support would show:

1. Plaintiff filed his Original Complaint on March 12, 2018. (Doc. 1, Compl.).
2. Plaintiff requested waiver of service on April 24, 2019. The Turner Defendants waived service of process two weeks later on May 6, 2019 .
3. The Turner Defendants’ responsive pleading deadline is currently June 24, 2019. Counsel for Plaintiff and the Turner Defendants have conferred and agree that, due to extenuating circumstances, an extension of the Turner Defendants’ responsive pleading deadline is appropriate. This extension is sought not for delay, but so that justice may be done.

To that end, the Turner Defendants request that the Court extend their deadline to answer or otherwise respond to Plaintiff’s Complaint by one week to July 1, 2019.

Respectfully submitted,

/s/ Robert P. Latham

Robert P. Latham

State Bar No. 11975500

blatham@jw.com

Jamison M. Joiner

State Bar. No. 24093775

jjoiner@jw.com

JACKSON WALKER L.L.P.

2323 Ross Avenue, Suite 600

Dallas, Texas 75201

(214) 953-6000 – Telephone

(214) 953-5822 – Facsimile

**ATTORNEYS FOR TURNER
DEFENDANTS**

CERTIFICATE OF CONFERENCE

This is to certify that on June 18, 2019, the undersigned counsel conferred with counsel for Plaintiff by email about the relief requested in this motion, and Plaintiff's counsel is unopposed to the requested relief.

/s/ Robert P. Latham

Robert P. Latham

CERTIFICATE OF SERVICE

This is to certify that this document was duly served on all counsel of record through the Court's electronic filing system on June 19, 2019.

/s/ Robert P. Latham

Robert P. Latham